

In re:

**Aftab Syed Kazmi,**

Debtor.

Case No. 15-11836-RGM

Chapter 11

Hearing: December 8, 2015, at 11:00 am

**Motion to Convert Case to Chapter 7 or Dismiss Case**

Comes Now, W. Judy A. Robbins, United States Trustee, by counsel, and moves the Court to convert this Chapter 11 case to Chapter 7 or to dismiss the case. In support of this motion the following representations are made:

1. The Court has jurisdiction in this matter pursuant to 28 U.S.C. § 1334.
2. This is a core proceeding.
3. This is the debtor's third bankruptcy case since 2012.

Date Filed	Number	Chapter	Disposition
09/20/12	12-15681-BFK	13	Dismissed 12/17/12
02/27/13	13-10897-BFK	11 converted to 7	Discharged 04/09/14 Closed
05/28/15	15-11836-RGM Present Case	11	Pending

4. This case was filed on May 28, 2015.
5. The debtor has not filed a disclosure statement and plan of reorganization.
6. Cause exists to convert or dismiss this case:

(A) Unreasonable delay in filing disclosure statement and plan of reorganization that is  
Office of United States Trustee  
Jack Frankel, Attorney  
115 S Union Street  
Alexandria, VA 22314  
(703) 557-7229

WHEREFORE, the United States Trustee respectfully requests that the Court enter an order converting this case to a case under Chapter 7 of the Bankruptcy Code, dismissing this Chapter 11 case, and granting such other and further relief as may be deemed just and proper.

October 16, 2015

Judy A. Robbins  
United States Trustee

/s/Jack I. Frankel  
Jack I. Frankel, Attorney  
Office of United States Trustee  
115 South Union Street, Suite 210  
Alexandria, VA 22314  
(703) 557-7176

Certificate of Service

I hereby certify that on the 16th day of October, 2015, I mailed, first class, postage prepaid, a true copy of this motion and notice of motion to:

<b>Aftab Syed Kazmi</b> 43007 Jannys Cornor Ct Ashburn, VA 20148
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/s/ Jack I. Frankel  
Jack I. Frankel